



Innovative Treatment Technologies:

1. In conjunction with the study of the Rest of the River section of the Housatonic River, EPA will actively investigate the potential for using innovative treatment technologies for the remediation of ~~the Rest of the River~~ in the following ways:
 - . Utilizing the EPA SITE Program, the EPA will conduct a search of appropriate national databases to determine potentially applicable treatment technologies. This information will be made available to the Housatonic River Initiative (HRI)(as EPA's technical assistance grant recipient), the Citizens Coordinating Council (CCC), and other interested parties.
 - . The extensive studies of treatment technologies compiled for the cleanup of New Bedford Harbor will be completed and will be made available to HRI, the Citizens Coordinating Council, and other interested parties.
 - . EPA will make available employees with a national perspective on the use and availability of innovative treatment technologies to the Citizens Coordinating Council. To better inform interested parties from South Berkshire County and CT, EPA will also conduct a special meeting to address their specific interests.
 - . Based on all of this information, EPA will, with public involvement, evaluate whether or not to conduct pilot treatability studies for innovative treatment technologies for the potential cleanup of the Rest of the River section of the Housatonic River. For example, EPA will consider soliciting bids from potential vendors for treatability studies.

Public Education and Monitoring:

2. To help ensure that the cleanups effectively protect human health and the environment, are clearly understood by the public and will meet EPA's performance standards, EPA will do the following:
 - . EPA will continue to make staff available to the public for the purpose of helping to explain its performance standards for removal actions and activities throughout the GE/Pittsfield Site, including but not limited to the Hill 78 and Building 71 landfills, the ½ Mile Removal Action in the Housatonic River, ongoing Source Control measures, and Silver Lake.
 - . EPA will make available monitoring and sampling data, and explore ways

to inform and educate the public about how to monitor the effectiveness of its remedies and enhance public confidence that the remedies are meeting EPA's performance standards.

- To better help the public understand the technical issues involved in monitoring and establishing the effectiveness of its remedies, EPA will develop a chart which clearly spells out the cleanup performance standards for each of the response actions under the Consent Decree (including numerical performance standards where appropriate), including, but not limited to, the Hill 78 and Building 71 landfills, Unkamet Brook, the Oxbow Areas, the Removal Action in the first ½ mile of the Housatonic River, Silver Lake, and the GE Plant Area.
- For Silver Lake, EPA will actively involve the public by soliciting public comment on the proposed design for the cap and armor system for the lake bottom. As required by the Consent Decree, the design of the cap will be based on a computer model which will be able to predict future PCB concentrations in the capping material. Those predicted PCB concentrations will then be used to determine compliance with the performance standards in the Consent Decree (i.e., whether or not the cap is performing in general accordance with the predictions on which the cap design was based in terms of effectively controlling migration of PCBs). The EPA will develop a chart which contains the predicted concentrations resulting from the computer modeling. Following the implementation of its capping remedy and introduction of new fish, EPA will ensure that fish and sediments are monitored in Silver Lake. The EPA will post any new Silver Lake sampling data on its website so that the public can continue to monitor the effectiveness of the remedy.
- For the upper ½ mile reach, the design of the cap is based on a computer model which will be able to predict future PCB concentrations in the capping material. Those predicted PCB concentrations will then be used to determine compliance with the performance standards in the Consent Decree (i.e., whether or not the cap is performing in general accordance with the predictions on which the cap design was based in terms of effectively controlling migration of PCBs). The EPA will develop a chart which contains the predicted concentrations resulting from the computer modeling.

3. EPA will undertake the following measures to involve and educate the public about ongoing cleanup activities at the GE/Pittsfield Site.

- GE will host an "open house" 2 times a year to allow the public access to the on-going cleanup activities taking place on GE-owned properties, including but not limited to, the Hill 78 and Building 71 landfills,

Unkamct Brook, the removal action in the **first ½** mile of the Housatonic River, and GE plant cleanups.

- EPA's oversight of the project includes taking split samples with GE. In order to effectively manage resources and ensure public confidence in the effectiveness of the cleanup, EPA will discuss with the **HRI**, the CCC, and other interested parties, key locations for split sampling. EPA will post sampling results on ~~its website~~, and will consider making some of its split samples available to independent qualified researchers.
- EPA will consult with the **HRI**, the CCC, and other interested parties to **find** ways to expand and improve the public's access, via the EPA's **website**, to important sampling and other data regarding the ongoing cleanups at this Site.
- EPA will work ~~with the HRI, the CCC, and other interested parties~~, to make the CCC **process more** effective, including requesting that the CCC facilitator monitor the ongoing list of recommendations made by CCC members. Recommended subject matters will remain on the list until the CCC agrees to remove them, or until the matter has been resolved.
- EPA **will** make public an anticipated schedule with interim deadlines for the Rest of the River activities. In addition to the public participation and appeal rights afforded with regard to the reissued RCRA permit, EPA will hold periodic discussions with affected municipalities in Berkshire County and Connecticut to discuss progress and provide updates on issues of importance to these communities, including potential treatment and disposal options.

Property Owner Protections:

4. EPA recognizes the concerns of those commercial property owners within the Oxbow Areas, and will ensure a timely and efficient implementation of **the** cleanup options under the Consent Decree, including **the** timely and efficient implementation of any future cleanup actions that result from a change in the property's current use.
5. EPA will develop with property owners a procedure to respond to property owners' concerns about future activities and uses, including emergency utility work.
6. EPA **will** provide a letter of clarification, upon request, to homeowners with contaminated property, stating that the EPA will not pursue innocent homeowners for liability with respect to GE-related PCB contamination on their property. Innocent homeowners are those homeowners who have done nothing to cause or

contribute to the contamination.

7. If new information or previously unknown conditions, together with other relevant information, indicate that PCB contamination **exists** at concentrations that are not protective of human health or the environment at previously remediated fill or floodplain properties, EPA will work with Massachusetts Department of Environmental Protection (MDEP) in a timely and **efficient** manner to ensure that these properties are addressed and remediated if necessary.
8. EPA and MDEP will **continue to work with interested parties, including HRI, Citizens for PCB Removal, Get REAL, and the CCC**, to pursue implementation of an improved process for community involvement in the residential till cleanup program.

Other Areas of Concern:

9. EPA will work with MDEP to ensure that **the extent** of PCB contamination in the West Branch of the Housatonic River is defined. EPA will also work with MDEP to determine whether the King Street Dump has impacted the River.
10. EPA will work with MDEP to ensure that the “wood giveaway” program is investigated and that unacceptable risks to human health or the environment, if any, are remediated.
11. EPA will ensure that any commercial or residential properties within the Oxbow Areas with earthen floors are investigated, sampled, and that unacceptable risks to human health or the environment, if any, are remediated.